

**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street, 3rd floor  
New York, New York 10007*

*2/24/15*

February 24, 2015

**BY FACSIMILE**

The Honorable Michael H. Dolinger  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Barone v. United States, et al.*, No. 12-cv-4103 (LAK) (MHD)

Dear Judge Dolinger:

This office represents Defendants the United States of America, Agent Michael Gaeta, Agent Gregorio Miceli, and Agent Michael Trombetta in the above-referenced action. We write respectfully to request a one-week extension of time to file Defendants' reply in support of their motion to dismiss the Amended Complaint and Defendants' opposition to Plaintiff's cross-motion to unseal grand jury materials, from February 24, 2015, to March 3, 2015. See Dkt. No. 65. The reason for Defendants' request is the temporary absence of the undersigned counsel due to the need to attend to a serious family illness. Because the extension of this deadline necessitates a corresponding one-week adjournment of Plaintiff's deadline to file a reply in support of his cross-motion to unseal grand jury materials, which is currently March 6, 2015, we also respectfully request on behalf of Plaintiff that the Court so-order an adjournment of Plaintiff's deadline to file a reply in support of his cross-motion to March 13, 2015.

The Court granted one previous request for an extension of these deadlines. See Dkt. No. 65. I have conferred with Plaintiff's counsel, who consents to this request.

*ENDORSED  
order  
Application granted.  
Rebecca S. Tinio  
2/24/15*

Respectfully,  
PREET BHARARA  
United States Attorney

By: */s/ Rebecca S. Tinio*  
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**FAX Cover Sheet**

Date: **February 24, 2015**

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Re: **Barone v. United States of America et al  
12 cv 04103 (LAK) (MHD)**

**Text of enclosed endorsed order: "Application granted."**

From: **Magistrate Judge Michael H. Dolinger  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1670  
New York, New York 10007-1312**

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